

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

TROY E. TILLERSON,

Plaintiff,

vs.

THE MEGA LIFE AND HEALTH  
INSURANCE CORPORATION, a  
corporation; TRANSAMERICA LIFE  
INSURANCE COMPANY F/K/A PFL  
LIFE INSURANCE COMPANY, a  
corporation; NATIONAL ASSOCIATION  
FOR THE SELF EMPLOYED A/K/A  
NASE, a corporation,

Defendants,

CASE NO. 3:05-cv-985-MEF

**NOTICE OF DEPOSITION DUCES TECUM FOR SUE TINKEY**

TO: Steven W. Couch, Esq.  
Hollis & Wright, P.C.  
505 North 20th Street, Suite 1750  
Birmingham, Alabama 35203

DEPONENT: Sue Tinkey

DATE AND TIME: Thursday, June 22, 2006 -- Immediately following the depositions of  
Wendell Braswell and Sonya Braswell being conducted in *Braswell v.*  
*The MEGA Life and Health Insurance Company, et al.*

PLACE: Hollis & Wright, P.C.  
505 North 20th Street, Suite 1750  
Birmingham, Alabama 35203

COURT REPORTER: Henderson and Associates

Please take notice that ALFORD, CLAUSEN & McDONALD, LLC, attorneys for  
defendants, will take the deposition of the deponent named above, at the time, date and location  
indicated above, upon oral examination pursuant to the Federal Rules of Civil Procedure before



an officer duly authorized to administer oaths and swear witnesses. The oral examination will continue from day to day until completed. You are cordially invited to attend if you so desire.

The deponent is requested to produce at said deposition, for inspection and copying, the items described on Exhibit "A" attached hereto, pursuant to Federal Rule of Civil Procedure 30(b)(5).



JAMES W. LAMPKIN II (LAMPJ7474)  
PAMELA A. MOORE (MOORP5421)  
Attorneys for Defendants  
The MEGA Life and Health Insurance Company,  
Transamerica Life Insurance Company, and  
National Association for the Self-Employed, Inc.

OF COUNSEL:

ALFORD, CLAUSEN & McDONALD, LLC  
One St. Louis Centre, Suite 5000  
Mobile, Alabama 36602  
(251)432-1600  
(251)432-1700 (fax)

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on all counsel of record by depositing a copy of same in the United States mail, properly addressed and first class postage prepaid as follows:

Steven W. Couch, Esq.  
Hollis & Wright, P.C.  
505 North 20th Street, Suite 1750  
Birmingham, Alabama 35203

Done this 7th day of June, 2006.



COUNSEL

**EXHIBIT A**

1. Produce each and every document in your possession or control that relates to the claims raised in the Complaint, including but not limited to the insurance application, the insurance certificate including all riders and endorsements, schedules of benefits, premium payments, brochures, pamphlets and claims for insurance benefits.

2. Produce each and every document containing or constituting correspondence with any of the three named defendants or which otherwise evidence or illustrate any communication with any of the three named defendants at any time that pertains to the matters referred to in the Complaint, including but not limited to the insurance application, the insurance certificate including all riders and endorsements, schedules of benefits, premium payments, brochures, pamphlets and claims for insurance benefits.

3. Produce any and all statements, documents, notes, memoranda, etc. in any form pertaining to the matters referred to in the Complaint which are in your possession or control, including but not limited to any such documents that were prepared by, dictated by, and/or drafted by you, or where information was supplied by you, pertaining to the matters referred to in the Complaint.

4. Produce any and all cancelled checks, bank records, statements, computer records and/or any other document in your possession or control that evidence or relate to premium payments made by you on behalf of the plaintiff for the insurance at issue.

5. Produce a copy of any and all complaints and answers served in any lawsuit to which you have been or are a party.

6. Produce a copy of any and all documents relating to any arrest(s) and/or conviction(s) you may have received in the past.